

ERWIN ENGINEERING

Geotechnical/Environmental Consultants

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December 30, 2017

California Regional Water Quality Control Board
1695 E Street, Suite 100
Fresno California 93706

Attention: Mr. Jeffrey Pyle

RE: Tentative Waste Discharge Requirements Order For
Primex Farms L.L.C., Pistachio Processing Plant, Kern County

This letter summarizes Erwin Engineering's comments on the Tentative Order
R5-2018-XXXX for Primex Farms, Pistachio Processing Facility.

The following findings and suggested revisions are for the Tentative Waste
Discharge Requirements (WDR) and the Monitoring and Reporting Program (MRP)
portion of the subject Tentative Order.

The Monitoring and Reporting Program, page 5, notes the annual Soils
Monitoring locations shall be determined with CRWQCB staff concurrence, a
suitable number locations within the land application area. "The discharger
shall submit a map to the Central Valley Board with the identified sampling
locations no fewer than 60 days prior to the soils sampling event following
adoption of this order".

Recommendation 1: The discharger shall submit a map to the Central Valley
Board with the identified sampling locations no fewer than 60 days prior
to the soils sampling event following adoption of this order. The soil
sampling shall be obtained one to two months prior to the start of the
pistachio processing season.

The Monitoring and Reporting Program, page 5, notes the Annual Report shall
be due no later than 1 February of the year following the processing season.

Recommendation 2: The Annual Report shall be due no later than February 15
of the year following the prior years pistachio processing season.

If you have any questions or if we may be of further service, please do not
hesitate to contact me at (559) 284-6795.

Respectfully submitted,
ERWIN ENGINEERING

Michael R. Erwin, PE, CE18625

cc: Primex Farms

Project No. 046-127-039

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